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December 22, 2020

BY CM/ECF

The Honorable Colm F. Connolly United States District Court 844 N. King Street Wilmington, DE 19801-3555

Re: Samsung Electronics Co., Ltd. v. Imperium IP Holdings (Cayman), Ltd., C.A. No. 15-1059-CFC

Dear Judge Connolly:

I write on behalf of plaintiff Samsung Electronics Co., Ltd. ("Samsung") concerning the motion for preliminary injunction filed today by Samsung.

The parties have met and conferred about an appropriate briefing schedule for this motion in light of the December holidays. The parties also discussed potential efficiencies for the Court and the parties by consolidating oral argument on Samsung's motion for preliminary injunction (should the Court agree to hold oral argument) with oral argument on defendant Imperium IP Holdings (Cayman), Ltd.'s ("Imperium") motion to transfer (D.I. 100), presently set by the Court for January 4, 2021 (December 15, 2020 Oral Order).

The parties are pleased to report they reached agreement about these subjects, as set forth in the enclosed proposed order, subject to Your Honor's approval.

The parties are available at the convenience of the Court if Your Honor has questions or concerns about these subjects.

Respectfully submitted,

/s/ John W. Shaw

John W. Shaw (No. 3362)

cc: Clerk of the Court (by hand delivery)
All counsel of record (by email)